

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v.
Purdue Pharma L.P., et al.,*
Case No. 18-op-45090

and

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.,*
Case No. 1:18-op-45004

MDL No. 2804

Hon. Dan Aaron Polster

**DECLARATION OF SHANNON E. MCCLURE IN SUPPORT OF DEFENDANTS'
MOTION TO EXCLUDE EXPERT TESTIMONY PURPORTING TO RELATE TO
ABATEMENT COSTS AND EFFORTS**

I, Shannon E. McClure, declare as follows:

1. I am an attorney at Reed Smith, LLP, counsel for Distributor Defendant AmerisourceBergen Drug Corporation in the above-captioned case.
2. I submit this declaration in support of Defendants' Motion to Exclude Expert Testimony Purporting to Relate to Abatement Costs and Efforts.
3. Attached as Exhibit A is a true and correct copy of the April 3, 2019 Expert Report of G. Caleb Alexander, M.D.
4. Attached as Exhibit B is a true and correct copy of the April 17, 2019 Expert Report of G. Caleb Alexander, M.D.

5. Attached as Exhibit C is a true and correct copy of the excerpts of April 26, 2019 deposition of G. Caleb Alexander, M.D.
6. Attached as Exhibit D is a true and correct copy of the April 3, 2019 Expert Report of Jeffrey B. Liebman, Ph.D.
7. Attached as Exhibit E is a true and correct copy of the excerpts of the May 3, 2019 deposition of Jeffrey B. Liebman, Ph.D.
8. Attached as Exhibit F is a true and correct copy of the March 24, 2019 Expert Report of Katherine Keyes, Ph.D.
9. Attached as Exhibit G is a true and correct copy of the excerpts of the April 29, 2019 deposition of Katherine Keyes, Ph.D.
10. Attached as Exhibit H is a true and correct copy of the March 25, 2019 Expert Report of Scott L. Wexelblatt, M.D.
11. Attached as Exhibit I is a true and correct copy of the excerpts of the April 24, 2019 deposition of Scott L. Wexelblatt, M.D.
12. Attached as Exhibit J is a true and correct copy of the March 25, 2019 Expert Report of Nancy K. Young, Ph.D.
13. Attached as Exhibit K is a true and correct copy of the excerpts of the May 14, 2019 deposition of Nancy K. Young, Ph.D.
14. Attached as Exhibit L is a true and correct copy of the March 25, 2019 Public Nuisance Expert Report of Thomas McGuire, Ph.D.
15. Attached as Exhibit M is a true and correct copy of excerpts of the April 23, and 30, 2019 depositions of Thomas McGuire, Ph.D.

Dated: June 28, 2019

Respectfully submitted,

/s/ Mark S. Cheffo

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¹ Teva Pharmaceutical Industries Ltd., Allergan plc, and Mallinckrodt plc are respectively an Israeli corporation, Irish holding company, and Irish company that are not subject to and contest personal jurisdiction for the reasons explained in their pending motions to dismiss for lack of personal jurisdiction; they are specially appearing to join this motion as a result of the Court's deadline to file dispositive and Daubert motions, and, thus, they do not waive and expressly preserve their pending personal jurisdiction challenges.

/s/ Enu Mainigi

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CERTIFICATE OF SERVICE

I hereby certify that Distributors have served the foregoing on the Parties, the Court, and the Special Masters in accordance with the Court's directions at Doc. No. 1719.

/s/ Shannon E. McClure

Shannon E. McClure